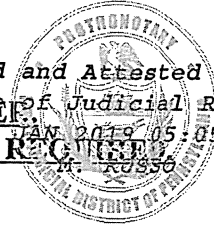


EXHIBIT B

Filed and Attested by the
Office of Judicial Records
07 JAN 2019 05:05 pm
M. 68832

THIS IS A NON-JURY MATTER
ASSESSMENT OF DAMAGES REQUIRED



BENTLEY M. SAUL, LTD.

By: Bentley M. Saul, Esquire

Identification No.: 68832

The Saul Law Building

1313 Race Street

Philadelphia, PA 19107

(215) 496-1100

Attorney for Plaintiff

REGINA BREWINGTON :
2545 S. 62nd Street :
Philadelphia, Pennsylvania 19142 :
v. :
DOLLAR GENERAL :
7620 Lindbergh Boulevard :
Philadelphia, Pennsylvania 19153 :
and :
DOLLAR GENERAL CORPORATION :
100 Mission Ridge :
Goodlettsville, Tennessee 37072 :
and :
DOLGENCORP, LLC :
100 Mission Ridge :
Goodlettsville, Tennessee 37072 :
and :
DOLLAR GENERAL INC. :
415 32ND Street, Suite 306 :
Union City, New Jersey 07087 :
and :
JERMAINE MORGAN :
7620 Lindbergh Boulevard :
Philadelphia, Pennsylvania 19153 :
and :
FRED BROWN :
7620 Lindbergh Boulevard :
Philadelphia, Pennsylvania 19153 :

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

SEPTEMBER TERM, 2018
NO: 0261

CIVIL ACTION COMPLAINT
Premises Liability-Fall Down Case

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association
Lawyer Referral and Information
One Reading Center
Philadelphia, Pennsylvania
(215) 238-6333

AVISO

Le han demandado a usted on la corte. Si usted quire defenderee de estas demandas expuestas en las peginas siquieries, usted bene vente (2)dias de plazo al pertir de la fecha de la demanda y la notification. Mace faltz assentar uno comperencia escrita o en persona o con un abogado y entregar a la corte en forme escrite sus defendree o sus objeciones a les demandes on contra de su persona. See evisado que ei usted no se defenda, la corte tomare' medides y guade conouer le demando on contra suye sin perrio avise o notification. Adern la corte suerdo decider a favor del demandante y require que usted cunola con todas las provisiones de uste demanda. Usted sued porder dinere o sus propiedeedes u oros cerechos importantes pere usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENT ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DOMOE SE PUEDE CONSEGUIR ASISTENCIA LEGAL

Asociacion De Licenciados De Filadelfia
Servicio De Referencia E Informacion Legal
One Reading Center
Philadelphia, Pennsylvania
Telefono: (215) 238-6333

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COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

SEPTEMBER TERM, 2018

NO: 0261

CIVIL ACTION COMPLAINT
Premises Liability-Fall Down Case

Plaintiff, by counsel Bentley M. Saul, Esquire hereby demands damages from the
Defendants herein, and in support thereof, avers:

1. Plaintiff Regina Brewington is an adult individual who resides at the above captioned address.
2. Defendant Dollar General is an organized and existing business entity which may be served with process at the above captioned address.
3. Defendant Dollar General Corporation is an organized and existing business entity which may be served with process at the above captioned address.
4. Defendant Dolgencorp, LLC is an organized and existing business entity which may be served with process at the above captioned address.
5. Defendant Dollar General, Inc. is an organized and existing business entity which may be served with process at the above captioned address.
6. Defendant Jermaine Morgan is an individual who may be served with process at the above captioned address.
7. Defendant Fred Brown is an individual who may be served with process at the above captioned address.

COUNT I
PLAINTIFF V. DEFENDANTS
NEGLIGENCE AND RECKLESSNESS

8. Plaintiff hereby incorporates paragraphs 1 through 7 above as if they were set forth fully and completely herein.
9. At all times material hereto Defendants owned operated occupied maintained managed controlled and were fully and completely responsible for all aspects of the property, the business, the store, the floor, and all improvements, fixtures, personal property, stock and merchandise for sale at the Dollar General Store at 7620 Lindbergh Boulevard, Philadelphia, PA.
[“Dollar General Store”].
10. At all times material hereto all Defendants acted by and through its/their agents, servants, workmen and employees, including Defendants Morgan and Brown, all of whom were acting within the course and scope of their agency and employment with the Dollar General Store and Dolgencorp entity Defendants.
11. At all times material hereto there existed a dangerous hazardous and unsafe condition at the Dollar General Store including but not limited to trash and debris including clear plastic wrap

strewn about the floor in the way of customers ["Fall Down Hazard"].

12. There were also no warnings or areas in the Dollar General Store that were blocked off so as to alert store customers and business visitors and invitees of the Fall Down Hazard and/or to prevent store customers and business visitors and invitees from encountering the Fall Down Hazard.

13. On October 2, 2016 Regina Brewington was a customer of Defendants at the Dollar General Store when she was caused to fall to the floor as a direct result of the said Fall Down Hazard.

14. At all times material hereto the Fall Down Hazard was created by Defendants.

15. Defendants agents and employees admitted to and apologized to Regina Brewington for the Fall Down Hazard and for causing her to fall.

16. At all times material hereto Defendants had actual notice of the Fall Down Hazard sufficiently in advance of this incident for Defendants to have timely cured, corrected, cleaned up, blocked off, guarded, remedied and warned of it however Defendants ignored any and all prior notice and failed to take any such action whatsoever before Ms. Brewington was injured.

17. At all times material hereto Defendants should have known about and therefore had constructive notice of the Fall Down Hazard sufficiently in advance of this incident for Defendants to have timely cured, corrected, cleaned up, blocked off, guarded, remedied and warned of it however Defendants ignored any and all prior notice and failed to take any such action whatsoever before Ms. Brewington was injured.

18. At all times material hereto this incident was caused solely by the negligence and recklessness of the Defendants.

19. At all times material hereto this incident was not caused by any act or failure to act on the part of Regina Brewington who at all times acted reasonably and with all due and appropriate care.

20. At all times material hereto Regina Brewington was a business invitee of Defendants to whom Defendants owed the highest duty of care.

21. At all times material hereto Defendants breached the duty of care they owed to Regina Brewington.

22. As a result of the direct and/or vicarious and joint and/or several negligence and

recklessness of the Defendants, Regina Brewington was caused to sustain serious permanent disabling and life-altering injuries as well as other damages which may include but may not be limited to her back, spine, discs, body, bone(s), extremity(s), knees, wrist, hands, joint(s), nerves, tendon(s), tissues and the following elements for which compensation is claimed from Defendants according to law:

- a. Internal derangement of the knees per MRI;
- b. Internal derangement and impingement of the right shoulder per MRI;
- c. Right elbow common flexor myo-tendinopathy with intrasubstance splitting/partial tear per MRI;
- d. S1 lumbar radiculopathy/nerve damage per EMG;
- e. Chondromalacea patella, tendinitis and meniscal damage;
- f. Sprains and strains;
- g. Past medical expenses incurred for diagnosis, treatment and care of the said personal injuries;
- h. Future medical expenses incurred for the diagnosis, treatment and care of the said personal injuries;
- i. Past lost earnings;
- j. Past lost earning capacity;
- k. Future lost earnings;
- l. Future lost earning capacity;
- m. Past pain;
- n. Future pain;
- o. Past suffering;
- p. Future suffering;
- q. Embarrassment and humiliation;
- r. Disfigurement and scarring [if surgery performed];
- s. Past and loss of enjoyment of life;
- t. Future loss of enjoyment of life; and,
- u. Other injuries and damages that may result from this fall down incident.

WHEREFORE, Plaintiff demands damages from the Defendants herein jointly and/or severally and directly and/or vicariously in an amount in excess of the arbitration limits plus interest thereon, costs, and any other sums that this Honorable Court deems appropriate.

BENTLEY M. SAUL, LTD.

By: /s/
Bentley M. Saul, Esquire
Attorney for Plaintiff

VERIFICATION

I, Rgina Brewington, verify that the facts set forth in my Civil Action Complaint are true and correct to the best of my knowledge, information and belief. I further acknowledge my understanding that false statements are made subject to the penalties of 18 Pa. C.S.A Section 4904 relating to unsworn falsification to authorities.

Rgina Brewington